

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYMOND JOE HILDERBRAND,
JENNIFER LYNN HILDERBRAND,

Defendants.

Case No.: 2:23-CR-0114-TOR

PROTECTIVE ORDER

The United States of America, having applied to this Court for a Protective Order regulating disclosure of the discovery materials and the confidential medical information contained therein (the “Discovery”) to defense counsel in connection with the Government’s discovery obligations, and the Court finding good cause therefore, **IT IS HEREBY ORDERED:**

1. The United States’ Unopposed Motion for Protective Order Regulating Disclosure of Discovery and Sensitive Information is **GRANTED**.

2. The United States is authorized to disclose the discovery including sensitive information and materials (hereinafter “Discovery”) in its possession pursuant to the discovery obligations imposed by this Court.

1 3. Government personnel and counsel for Raymond Joe Hilderbrand and
2 Jennifer Lynn Hilderbrand (“Defendants”), shall not provide, or make available, the
3 sensitive information in the Discovery to any person except as specified in the Order
4 or by approval from this Court. Counsel for Defendants and the Government shall
5 restrict access to the Discovery, and shall only disclose the sensitive information in
6 the Discovery to their client, office staff, investigators, independent paralegals,
7 necessary third-party vendors, consultants, and/or anticipated fact or expert
8 witnesses to the extent that defense counsel believes is necessary to assist in the
9 defense of their client in this matter or that the Government believes is necessary in
10 the investigation and prosecution of this matter. No copies of Discovery shall be left
11 with their client.

12 4. Third parties contracted by the United States or counsel for Defendants
13 to provide expert analysis or testimony may possess and inspect the sensitive
14 information in the Discovery, but only as necessary to perform their case-related
15 duties or responsibilities in this matter. At all times, third parties shall be subject to
16 the terms of the Order.

17 5. Discovery in this matter will be available to defense counsel via access
18 to a case file on USA File Exchange. If necessary to review discovery with their
19 respective clients, defense counsel may download the discovery and duplicate only
20 once. Discovery materials may not be left in the possession of Defendants. In order
21 to provide discovery to a necessary third-party vendor, consultant, and/or anticipated
22 fact or expert witness, counsel for Defendants may duplicate the discovery only
23 once. No other copies may be made, by defense counsel or the defendants, without
24 prior approval from this Court.

25 6. All counsel of record in this matter, including counsel for the United
26 States, shall ensure that any party, including the Defendants, that obtains access to
27 the Discovery, is provided a copy of this Order. No other party that obtains
access

1 to or possession of the Discovery containing sensitive information shall retain such
2 access to or possession of the Discovery containing sensitive information shall retain
3 such access to or possession unless authorized by this Order, nor further disseminate
4 such Discovery except as authorized by this Order or the further Order of this court.
5 Any other party that obtains access to, or possession of, the Discovery containing
6 discovery information once the other party no longer requires access to or possession
7 of such Discovery shall promptly destroy or return the Discovery once access to
8 Discovery is no longer necessary. For purposes of this Order, “other party” is any
9 person other than appointed counsel for the United States or counsel for Defendants.

10 7. All counsel of record, including counsel for the United States, shall
11 keep a list of the identity of each person to whom the Discovery containing sensitive
12 information is disclosed and who was advised of the requirements of this Order.
13 Neither counsel for Defendants nor counsel for the United States shall be required
14 to disclose this list of persons unless ordered to do so by the Court.

15 8. Upon entry of a final order of the Court in this matter and conclusion
16 of any direct appeals, government personnel and counsel for Defendants shall
17 retrieve and destroy all copies of the Discovery containing sensitive information,
18 except that counsel and government personnel may maintain copies in their closed
19 files following their customary procedures.

20 9. Government personnel and counsel for Defendants shall promptly
21 report to the Court any known violations of this Order.

22 10. The proposed Protective Order submitted by the Government only
23 applies to “sensitive information” pertaining to the search warrants sought and

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1 obtained by the Government and records responsive thereto.

2 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter
3 this Order and provide copies to counsel.

4 **DATED** this 27th day of October 2023.



A handwritten signature in blue ink that reads "Thomas O. Rice".

THOMAS O. RICE
United States District Judge